## MAHER & PITTELL, LLP

ATTORNEYS AT LAW

Reply To: 42-40 Bell Blvd, Suite 302 Bayside, New York 11361 Tel (516) 829-2299 jp@jpittell.com Long Island Office 14 Bond St, Suite 389 Great Neck, New York 11021 Tel (516) 829-2299 jp@jpittell.com

January 19, 2020

Hon. Deborah A. Batts U.S. District Court 500 Pearl St New York, NY 10007 USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 1/21/2020

Re: US v. Pena Montero and Lora Jimenez, 19 Cr 52 (DAB)

Dear Judge Batts:

I am counsel for Carlos Alberto Lora Jimenez, a defendant in the above referenced matter.

Previously, Mr. Lora Jimenez pleaded guilty, before Your Honor, pursuant to a Plea Agreement.

Currently, the parties sentencing submissions are due tomorrow, January 20, 2020. To date, we have not yet received the draft PSR. In addition, I am still awaiting receipt of letters and other documents to include in the Sentencing Memorandum to be submitted on behalf of Mr. Lora Jimenez.

The sentencing date is currently scheduled for March 31, 2020. In light of the foregoing, I respectfully request the submission schedule be modified as follows:

March 10, 2020 at 4 p.m., parties submissions due;

March 17, 2020 at 4 p.m., replies to parties submissions (if any) due;

March 31, 2020 at 11 a.m. sentencing date (unchanged)

I have conferred with the Government and they consent to this my request.

Written submissions must be sent to the other side and the Court by April 6, 2020 at 4 p.m. Responses must be submitted to the initiating party and the Court by April 20, 2020 at 4 p.m. The date for sentencing is ADJOURNED SINE DIE./s DAB 1/21/2020

Respectfully submitted, /s/ Jeffrey G. Pittell

SO ORDERED.

Deborah A. Batts United States District Judge